

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JEREMY LEVIN and DR. LUCILLE LEVIN,

Plaintiff(s),

-against-

BANK OF NEW YORK, JP MORGAN CHASE,
SOCIETE GENERALE and CITI BANK

Defendant(s).

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CITIBANK, N.A.,

Third Party Plaintiff

-against-

[REDACTED]

ISLAMIC REPUBLIC OF IRAN, IRANIAN
MINISTRY OF INFORMATION AND SECURITY,
IRANIAN ISLAMIC REVOLUTIONARY GUARD
CORP., JEREMY LEVIN AND DR. LUCILLE LEVIN

Third Party Defendants

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**ANSWER TO THIRD
PARTY COMPLAINT OF
CITIBANK, N.A AGAINST
ACCOUNT HOLDERS AND
WIRE TRANSFER PARTIES**

Index No.: 09 Civ. 5900

Third-Party Defendant [REDACTED], by and through its undersigned attorneys,
Placid & Metu, P.C., states as its Answer to and in response to the Third-Party Complaint (the
“Complaint”) filed by Third Party Plaintiff Citibank, N.A., that [REDACTED] makes no claim to and
asserts no rights to or interest in any assets referenced in the Complaint and respectfully requests that the
Court dismiss with prejudice the Complaint as to [REDACTED].
[REDACTED] expressly reserves all rights to challenge the personal jurisdiction of this Court without
assuming the burden of proof of such defenses. Without submitting to the personal jurisdiction of this
Court, [REDACTED] further responds as follows:

Nature of the Proceedings

1. Denies knowledge or information concerning the allegations set forth in Paragraph 1 of the Complaint, except admits that CITIBANK, N.A. has filed the Complaint as alleged and named [REDACTED] as a Third Party Defendant.
2. Denies knowledge or information concerning the allegations set forth in Paragraph 2 of the Complaint.
3. Denies knowledge or information concerning the allegations set forth in Paragraph 3 of the Complaint.
4. Denies knowledge or information concerning the allegations set forth in Paragraph 4 of the Complaint.

Jurisdiction and Venue

5. States that Paragraph 5 of the Complaint states a legal conclusion to which no answer is necessary or appropriate, and otherwise denies knowledge or information concerning the remainder of the allegations set forth therein.
6. States that Paragraph 6 of the Complaint states a legal conclusion to which no answer is necessary or appropriate, and otherwise denies knowledge or information concerning the remainder of the allegations set forth therein.

Third-Party Plaintiff

7. Denies knowledge or information concerning the allegations set forth in Paragraph 7 of the Complaint.

Third-Party Defendants

8. Denies knowledge or information concerning the allegations set forth in Paragraph 8 of the Complaint.
9. Denies knowledge or information concerning the allegations set forth in Paragraph 9 of the Complaint.
10. Denies knowledge or information concerning the allegations set forth in Paragraph 10 of the Complaint.
11. Having been served with a copy of the third party complaint in which paragraph 11 is redacted, [REDACTED] is unable to respond to this paragraph.
12. Having been served with a copy of the third party complaint in which paragraph 12 is redacted, [REDACTED] is unable to respond to this paragraph.
13. Having been served with a copy of the third party complaint in which paragraph 13 is redacted, [REDACTED] is unable to respond to this paragraph.

14. Having been served with a copy of the third party complaint in which paragraph 14 is redacted, [REDACTED] is unable to respond to this paragraph.

15. Having been served with a copy of the third party complaint in which paragraph 15 is redacted, [REDACTED] is unable to respond to this paragraph.

16. Having been served with a copy of the third party complaint in which paragraph 16 is redacted, [REDACTED] is unable to respond to this paragraph.

17. Having been served with a copy of the third party complaint in which paragraph 17 is redacted, [REDACTED] is unable to respond to this paragraph.

18. Having been served with a copy of the third party complaint in which paragraph 18 is redacted, [REDACTED] is unable to respond to this paragraph.

19. Having been served with a copy of the third party complaint in which paragraph 19 is redacted, [REDACTED] is unable to respond to this paragraph.

20. Having been served with a copy of the third party complaint in which paragraph 20 is redacted, [REDACTED] is unable to respond to this paragraph.

21. Having been served with a copy of the third party complaint in which paragraph 21 is redacted, [REDACTED] is unable to respond to this paragraph.

22. Having been served with a copy of the third party complaint in which paragraph 22 is redacted, [REDACTED] is unable to respond to this paragraph.

23. Having been served with a copy of the third party complaint in which paragraph 23 is redacted, [REDACTED] is unable to respond to this paragraph.

24. Having been served with a copy of the third party complaint in which paragraph 24 is redacted, [REDACTED] is unable to respond to this paragraph.

25. Having been served with a copy of the third party complaint in which paragraph 25 is redacted, [REDACTED] is unable to respond to this paragraph.

26. Having been served with a copy of the third party complaint in which paragraph 26 is redacted, [REDACTED] is unable to respond to this paragraph.

27. Having been served with a copy of the third party complaint in which paragraph 27 is redacted, [REDACTED] is unable to respond to this paragraph.

28. Having been served with a copy of the third party complaint in which paragraph 28 is redacted, [REDACTED] is unable to respond to this paragraph 28.

29. Denies knowledge or information concerning the allegations set forth in Paragraph 29 of the Complaint, except admits that [REDACTED] is a corporation organized and existing under the laws of [REDACTED], with it's principal place of business in [REDACTED], [REDACTED].

30. Having been served with a copy of the third party complaint in which paragraph 30 is redacted, [REDACTED] is unable to respond to this paragraph.

31. Having been served with a copy of the third party complaint in which paragraph 31 is redacted, [REDACTED] is unable to respond to this paragraph.

32. Having been served with a copy of the third party complaint in which paragraph 32 is redacted, [REDACTED] is unable to respond to this paragraph.

33. Having been served with a copy of the third party complaint in which paragraph 33 is redacted, [REDACTED] is unable to respond to this paragraph.

34. Having been served with a copy of the third party complaint in which paragraph 34 is redacted, [REDACTED] is unable to respond to this paragraph.

35. Having been served with a copy of the third party complaint in which paragraph 35 is redacted, [REDACTED] is unable to respond to this paragraph.

36. Having been served with a copy of the third party complaint in which paragraph 36 is redacted, [REDACTED] is unable to respond to this paragraph.

37. Having been served with a copy of the third party complaint in which paragraph 37 is redacted, [REDACTED] is unable to respond to this paragraph.

38. Having been served with a copy of the third party complaint in which paragraph 38 is redacted, [REDACTED] is unable to respond to this paragraph.

39. Having been served with a copy of the third party complaint in which paragraph 39 is redacted, [REDACTED] is unable to respond to this paragraph.

The Turnover Proceeding

40. Denies knowledge or information concerning the allegations set forth in Paragraph 40 of the Complaint.

41. Denies knowledge or information concerning the allegations set forth in Paragraph 41 of the Complaint.

42. Denies knowledge or information concerning the allegations set forth in Paragraph 42 of the Complaint.

43. Denies knowledge or information concerning the allegations set forth in Paragraph 43 of the Complaint.

44. Denies knowledge or information concerning the allegations set forth in Paragraph 44 of the Complaint.

Phase One of the Turnover Proceeding

45. Denies knowledge or information concerning the allegations set forth in Paragraph 45 of the Complaint.

46. Denies knowledge or information concerning the allegations set forth in Paragraph 46 of the Complaint.

47. Denies knowledge or information concerning the allegations set forth in Paragraph 47 of the Complaint.

Phase Two of the Turnover Proceeding

48. Denies knowledge or information concerning the allegations set forth in Paragraph 48 of the Complaint.

49. Denies knowledge or information concerning the allegations set forth in Paragraph 49 of the Complaint, but states that [REDACTED] makes no claim to and asserts no rights to or interest in any assets referenced in the Complaint.

For The Claims of Citibank in the Nature of Interpleader

First Claim of Relief

50. [REDACTED] repeats and realleges each of its responses set forth above as if fully set forth herein.

51. States that Paragraph 51 of the Complaint states a legal conclusion to which no answer is necessary. To the extent a response is required, [REDACTED] admits that the quoted language is contained in CPLR § 5239.

52. States that Paragraph 52 of the Complaint states a legal conclusion to which no answer is necessary or appropriate.

Second Claim of Relief

53. [REDACTED] repeats and realleges each of its responses set forth above as if fully set forth herein.

54. Denies knowledge or information concerning the allegations set forth in Paragraph 54 of the Complaint, but states that [REDACTED] makes no claim to and asserts no rights to or interest in any assets referenced in the Complaint.

55. Denies knowledge or information concerning the allegations set forth in Paragraph 55 of the Complaint.

56. States that Paragraph 56 of the Complaint states a legal conclusion to which no answer is necessary or appropriate.

Third Claim of Relief

57. [REDACTED] repeats and realleges each of its responses set forth above as if fully set forth herein.

58. States that Paragraph 58 of the Complaint states a legal conclusion to which no answer is necessary or appropriate.

The remainder of the Complaint is a prayer for relief to which no response is required.

To the extent an answer is deemed required, the prayer for relief is denied in its entirety. All other allegations of the Complaint that are not specifically admitted are denied. [REDACTED] expressly reserves the right to amend and/or supplement this Answer.

AFFIRMATIVE DEFENSES

[REDACTED] asserts the following affirmative defenses. [REDACTED] states the following defenses without assuming the burden of proof of such defenses or conceding that any parties to the action have any claims or rights as to [REDACTED]. [REDACTED] further reserves the right to assert other affirmative defenses as discovery proceeds.

First Defense

The Court has no personal jurisdiction over [REDACTED]

WHEREFORE, [REDACTED], respectfully requests judgment:

(i) dismissing the third party complaint of Citibank, N.A., as against it, discharging [REDACTED] from any and all liability towards Citibank, N.A., with respect to the relevant blocked accounts and their proceeds,

(ii) awarding [REDACTED], its costs and expenses in this proceeding, including reasonable attorneys' fees; and

(iii) awarding [REDACTED] such other and further relief as the Court shall determine to be just and proper.

Dated: Jamaica, New York

January 16, 2012

Chijioke Metu, Esq.
PLACID & METU, P.C.
Attorneys for Third Party Defendant(s)

[REDACTED]
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Our File No. 1577